

ATTACHMENT 2

INSPECTION SCHEDULE

Security Information (264.14)

Procedures and equipment to prevent the unknowing entry, and to minimize the possibility for unauthorized entry, of persons or livestock onto the active portion of the facility are in place per the requirements of 40 CFR §264.14.

The plant proper has a 24-hour surveillance system manned by security guards which continuously monitors and controls entry onto the active portion of the facility. The plant proper is surrounded by fencing. All gates are manned, equipped with card reader system controls or locked.

The Goff Mountain Landfill is surrounded by fencing. Signs reading - DANGER - UNAUTHORIZED PERSONNEL KEEP OUT - surround the facility. A gate with a card reader system controls access to the site.

Inspections

Inspections will be conducted per the requirements of 40 CFR §264.15 and §270.14(b)(5).

General Inspection Requirements

Safety, emergency, security, fire, operating and structural equipment, and monitoring equipment receive routine inspections that are conducted by responsible Plant personnel. Any deficiencies noted will be addressed repaired as appropriate. The schedule for these inspections are contained in the Plant's Reliability Maintenance (RM) system, Plant and facility operational manuals and documents.

Types of Problems

Each permitted facility has checklists available that identify the types of problems which are to be looked for during inspections and the personnel doing the inspections. Anything that could cause an environmental or human health hazard is the subject of these inspections.

Frequency of Inspections

The "inspection frequency" is set based on several criteria, such as, but not limited to, manufacturers' suggestions, history of past problems or failures, severity of the consequences of malfunction, facility conditions, and regulatory requirements. Impact on personnel safety, community safety, and environmental protection, are also considered in setting these frequencies.

Landfill Inspections

Inspections are performed weekly and after storms (24-hour, 25-year storm) and documented on the facility's checklist.

Run-on and Run-off Control System

Clean/contaminated separation dikes, drains, and caps are inspected for erosion, structural integrity, and failure during and after storms.

Leachate Collection and Removal System

Surface collection drains in active areas of the GML are maintained. The leachate collection tank (Tank 608) is monitored and maintained. Where present, leachate and collection systems will be inspected weekly.

Wavier or Documentation of Preparedness and Prevention Requirements

Equipment Requirements

The facility is supplied with the following equipment or systems necessary to respond to emergency situations.

Internal Communications

Located throughout the plant are PA (public announcement) phones, "ring-down" phones, and regular telephones, that can be used to contact other personnel for help in emergency situations.

Located throughout the plant are emergency alarm boxes that, when activated, automatically sound an alarm that identifies the location of the alarm box. Plant emergency personnel, under the direction of the Shift Superintendant, respond to these alarms.

Plant personnel have access to hand-held, two-way radios that provide direct communication to the control room, other units, and the Plant's Emergency channel. With these they can summon help if an emergency situation arises.

External Communications

In addition to the regular telephones that are located throughout the plant, the Shift Superintendant (who is in charge during emergency situations), and some other supervisory personnel, have intrinsically safe cell phones that allow them to dial-up outside telephone numbers as necessary.

Emergency Equipment

The plant is supplied with portable fire extinguishers located throughout its operating structures, office buildings, and in remote areas. Some special type fire extinguishers are located in areas that have particular fire hazards. Also throughout the plant are fire hydrants to supply water for fire fighting equipment. The operating structures are protected by deluge sprinkler systems, that can be activated when needed.

The plant's Fire Department is equipped with a "foam-truck" and a fire truck with water and foam capabilities.

Other emergency equipment needed to save lives, and protect the environment are available on the Emergency Response truck and in various locations in the plant. Spill control and clean-up is aided by use of absorbent sheets, pads, and booms. Loose absorbents, such as ground clay and corn-cob, along with sand, are available in various locations throughout the plant. Drums are kept on site to containerize cleaned up spills, and wastes generated from clean-up activities. To help prevent migration of spilled material, sewer cover seals, drain plugs, and booms are available. Spills can also be surrounded with loose absorbent materials to prevent further migration.

Decontamination of personnel can be handled at Safety Showers located throughout the plant. The emergency squad has available a portable "decon" station. There is specialized equipment cleaning facilities on site, such as steam condensate wash stations, caustic bath vats, and grit blasting.

Water For Fire Control

Typically the fire water hydrants are; 6-1/4 inch pipe, 80-100 psig, and deliver in excess of 2,000 gpm, to two hoses. The majority are supplied with water from the river that is "boosted" in pressure by large electric pumps, these pumps come on anytime an alarm is sounded, or a drop in pressure is sensed within the fire water system. There are also diesel powered back up pumps.

The backup pumps are brought online whenever the fire hydrants are put in emergency use. Some hydrants have an attached fire water spray

nozzle that can be aimed where needed and locked into place. A few hydrants are supplied water by the potable water system.

Aisle Space Requirement

Adequate aisle space is provided for emergency equipment and personnel to access areas for spill clean-up or fire fighting.

Testing and Maintaining Equipment

Testing and maintaining of emergency response equipment is covered by plant procedures. All testing and inspections are done by trained personnel.

Arrangements With Local Authorities

Arrangements with local authorities are described in the Contingency Plan.

Preventive Procedures, Structures and Equipment

Unloading Operations

Goff Mountain Landfill

Bulk wastes are transported to GML by dump trucks or roll-off containers and are unloaded on a designated pad adjacent to the active area.

The heavy equipment operator uses appropriate safety equipment as described in Section F-4e.

Runoff

Goff Mountain Landfill

Runoff considerations for the landfill are described in Section D-6 of the Part B application.

Water Supplies

Neither the Kanawha River or local ground water is used as a drinking water supply near the Institute Plant. Provisions described in Section F-4b also serve, however, to protect the Kanawha River and ground water.

Mitigating Effects of Equipment Failure and Power Outages

The Institute Plant has redundant power systems. Should the Plant experience a complete power failure, equipment is designed to shutdown in a fail-safe mode.

The critical equipment for hazardous waste management at GML is heavy equipment, i.e., bulldozer or front-end loader. Temporary failure of the earth mover would have no effect on the environment or human health. Alternate equipment is available and when used is equipped with appropriate safety equipment.

Personnel Protective Equipment

Personnel at the Institute Plant's hazardous waste facilities are supplied with protective equipment designed to protect them from the expected hazards associated with the material to which they may be exposed. Along with their standard issue safety equipment, specialized equipment for certain work will be issued.

Precautions to Prevent Accidental Ignition or Reactions of Ignitable, Reactive, or Incompatible Wastes

The plant has basic safety rules and programs. In addition, each facility has a safety program. These procedures and programs work together to reduce or eliminate the possibility of ignition or reaction of ignitable, incompatible, and/or reactive waste.

Precautions To Prevent Ignition Or Reaction Of Ignitable Or Reactive Wastes

Precautions to prevent ignition or reaction of ignitable or reactive wastes are discussed further for each hazardous waste facility in Section D.

General Precautions For Handling Ignitable Or Reactive Wastes And Mixing Of Incompatible Waste

Precautions for handling ignitable or reactive wastes and mixing of incompatible waste are discussed further for each hazardous waste facility in Section D.

Management Of Ignitable, Reactive, or Incompatible Wastes In Containers

Bulk hazardous wastes delivered to GML are not incompatible with other wastes. The bulk wastes may consist of contaminated soil and debris; however these wastes do not exhibit ignitable or reactive characteristics, and are compatible with all other wastes.